

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**IN RE:** )  
 )  
**GREEN COPPER HOLDINGS, LLC** ) **CASE NO. 25-10088-T**  
**EIN # xx-xxx9708** ) **Chapter 7**  
 )  
 )  
**Debtor.** )

**TRUSTEE'S MOTION TO PAY PROFESSIONAL FEES TO D.R. PAYNE AND  
ASSOCIATES ("PAYNE") AND NOTICE OF OPPORTUNITY FOR HEARING**

Comes now the Trustee and states:

1. This Court previously authorized the employment of D.R. Payne and Associates ("Payne") as Expert Forensic Accountant for the Trustee (Doc. No. 11).
2. The time period covered by this motion is the 29<sup>th</sup> day of January 2025 through June 3, 2025. To date, Payne has received no compensation.
3. Attached as **Ex A** is an itemized statement of the time expended and services provided. As noted, Payne seeks approval of attorney fees totaling **\$7,314.65** plus expenses totaling **\$499.00**.
4. The time expended and services provided as specified in **Ex A** can be summarized as follows:
  - a. **Stalking Horse Contract:** Payne provided expert assistance in negotiating the terms and conditions of the "Stalking Horse Contract". Those services included among other matters reviewing costs incurred by the Stalking Horse prior to bankruptcy and determining a fair termination fee as part of the agreement. In

addition, Payne reviewed the proposed terms and conditions of the Stalking Horse Asset Purchase Agreement and assisted in evaluating the reasonableness of the offer. That required him to review schedules of assets, inventories of personal property, and pre-bankruptcy sale agreements. In addition, Payne reviewed the proposed bidding procedures and provided a declaration relative to the reasonableness of both the bidding procedures and the Stalking Horse agreement.

- b. Notice To Potential Bidders:** Payne researched and provided a proposed list of potential bidders and caused notice of the sale and the related bid procedures to approximately 900 possible bidders.

5. As noted, Payne seeks total fees for service provided and time expended of **\$7,314.65** and expenses of **\$449.00**. Trustee asserts that the fees and expenses prayed for are reasonable and necessary, and payment of such fees and expenses is in the best interests of the estate.

**NOTICE OF OPPORTUNITY FOR HEARING - Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder, Tulsa, Oklahoma 74103 no later than 24 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 24-**

day period includes the three (3) days allowed for mailing provided for in Fed. R. Bankr. P. 9006(f).

Respectfully Submitted by:

/s/ Patrick J. Malloy III  
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